

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

TRACEE A. BEECROFT, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

ALTISOURCE BUSINESS SOLUTIONS
PVT. LTD.,

Defendant.

Case No. 0:15-cv-02184-SRN-BRT

**PLAINTIFF’S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

1. This is a Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* (“TCPA”) case that alleges improper automated calls to cellular telephones. Plaintiff alleges that Altisource’s use of Aspect Software, Inc. telephone equipment to cell phones for purposes of its “Cash for Relocation” (“CFR”) program violated the TCPA.

2. With the assistance of experienced mediator and retired Magistrate Judge Morton Denlow, the parties have reached a proposed class action settlement.

3. The settlement calls for a \$1.8 million non-reversionary cash fund to be created by Altisource for the benefit of a class comprised of people whose cell phones Altisource called using Aspect for its CFR program.

4. Individual notice will be sent by United States Mail to addresses located in Altisource’s records associated with the 56,104 cell phone numbers called. The

administrator will do reverse-lookups for phone numbers that do not have valid addresses. The settlement also calls for Internet advertisement publication and an interactive settlement website where class members may submit claims.

5. As explained in the accompanying memorandum of law, Plaintiff respectfully submits that this settlement satisfies the standards for preliminary approval, and respectfully requests that the Court conditionally certify the class for settlement purposes, approve the notice plan as consistent with Rule 23 and Due Process, and grant preliminary approval to this proposed class settlement.

Respectfully submitted,

TRACEE A. BEECROFT

Dated: October 3, 2017

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